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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91156321
Party	Plaintiff THE CHAMBER OF COMMERCE OF THE UNITED ST
Correspondence Address	William M. Merone Kenyon & Kenyon 1500 K Street, N.W., Suite 700 Washington, DC 20005
Submission	Motion to Suspend for Settlement Discussions
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Date	03/13/2006
Attachments	Motion to Suspend 91156321.pdf (2 pages)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

THE CHAMBER OF COMMERCE OF
THE UNITED STATES OF AMERICA

Opposer,

v.

UNITED STATES HISPANIC CHAMBER
OF COMMERCE FOUNDATION,

Applicant.

Opposition No.: 91/156,321

Serial No.: 78/081,731

MOTION TO SUSPEND PROCEEDINGS

Pursuant to TBMP Section 510 and Trademark Rule 2.117, Opposer, The Chamber of Commerce of the United States of America, respectfully requests that the above-referenced opposition proceeding be suspended, subject to the right of either party to request resumption at any time. Opposer seeks the suspension of these proceedings to afford the parties time to continue ongoing settlement negotiations that, if successful, would obviate the need for further proceedings at the Trademark Trial and Appeal Board. Counsel for Applicant, the United States Hispanic Chamber of Commerce Foundation, was contacted regarding the requested suspension, but has not responded whether it intends to consent to or to oppose the request. Regardless, Opposer submits that it has shown good cause for why the consolidated proceeding should be suspended. *Accord MacMillan Bloedel Ltd. v. Arrow-M Corp.*, 203 USPQ 952 (TTAB 1979).

However, should the Board disagree, or should the pending *Motion to Suspend* be otherwise denied, Opposer requests in the alternative that the discovery and trial dates for

the pending proceeding be reset such that the discovery period (which at present is set to close on March 13, 2006) close no less than sixty (60) days following the Board's decision on the instant motion. Opposer believes that in the event the present *Motion* is denied, the additional time requested would be needed to facilitate the orderly presentation of the evidence in this case and submits that this alternative request is not being made for the purposes of mere delay but, rather, for the good cause stated above.

Respectfully submitted,

Date: March 13, 2006

/William M. Merone/

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